



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - -x

UNITED STATES OF AMERICA :

- v. - :

MICHAEL MANNION and :
KENNETH HOFFMAN, :

Defendant :
- - - - -x

MISDEMEANOR
INFORMATION

13 Cr.

13 CRIM075

COUNT ONE
(Unlawful Labor Payments)

The United States Attorney charges:

1. From in or about December 14, 2011 to in or about December 15, 2011, in the Southern District of New York and elsewhere, MICHAEL MANNION and KENNETH HOFFMAN, the defendants, persons acting in the interest of an employer, did unlawfully and willfully pay, lend, and deliver and agree to pay, lend, and deliver money and things of value in the approximate amount of \$1,000 to an employee, that is, a business agent of the International Union of Painters and Allied Trades, District Council 9, a labor organization engaged in an industry affecting commerce, with the intent to influence him in respect to his actions, decisions, and duties as an employee of such labor organization, in violation of Title 29, United States Code, Sections 186(a)(2), (a)(4) and (d)(2).

(Title 29, United States Code, Sections 186(a)(4) and (d)(2).)

Judge Buchwald

FORFEITURE ALLEGATIONS

2. As a result of committing the offense charged in Count One of this Misdemeanor Information, MICHAEL MANNION, the defendant, shall forfeit to the United States of America, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. 2461, any property constituting or derived from proceeds obtained directly or indirectly as a result of the offense alleged in Count One, including but not limited to a sum of money equal to \$5,300.00.

SUBSTITUTE ASSET PROVISION

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value;

or

e. has been commingled with other property which cannot be subdivided without difficulty,

it is the intent of the United States, pursuant to 18 U.S.C. § 981, 21 U.S.C. § 853(p), and 28 U.S.C. § 2461, to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)

A handwritten signature in black ink, appearing to read 'Preet Bharara', is written over a horizontal line.

PREET BHARARA
United States Attorney

UNITED STATES DISTRICT COURT
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Defendants.

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(29 U.S.C. §§ 186(a)(4) and (d)(2).)

PREET BHARARA

United States Attorney.
